

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**BENITO PALMARINI AND  
BERNADETTE PALMARINI,  
Plaintiffs,**

**v.**

**INTERNAL REVENUE SERVICE,  
Defendant.**

**CIVIL ACTION**

**NO. 17-3430**

**ORDER**

**AND NOW**, this 29th day of March, 2019, upon consideration of Defendant's Motion for Summary Judgment (ECF No. 18), Plaintiffs' Response in Opposition thereto (ECF No. 20), Defendant's Reply in further support thereof (ECF No. 21), and Defendant's additional declaration in support thereof (ECF No. 31), **IT IS ORDERED** that the Motion is **GRANTED IN PART AND DENIED IN PART**. The Motion is **DENIED** as to document 2955, and **GRANTED** as to the remaining documents.

**BY THE COURT:**

/s/Wendy Beetlestone, J.

\_\_\_\_\_  
**WENDY BEETLESTONE, J.**